

TRANSCRIPT OF PROCEEDINGS

In the Matter of:)
FAMILY BROADCASTING, INC.)
ORDER TO SHOW CAUSE WHY THE)
LICENSES FOR STATIONS WSTX (AM))
AND WSTX-FM, CHRISTIANSTED,)
U.S. VIRGIN ISLANDS, SHOULD NOT)
BE REVOKED)

EB 01-39

Deposition of: GERARD L. JAMES II

Pages: 1 through 86

Place: Washington, D.C.

Date: November 27, 2002

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ORIGINAL

IN THE FEDERAL COMMUNICATIONS COMMISSION

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U.S. VIRGIN ISLANDS, SHOULD NOT)
BE REVOKED)

Deposition of:

GERARD L. JAMES II

a witness of lawful age, taken on behalf of the Federal
Communications Commission, pursuant to notice, in the Club
Room, 510 N Street, S.W., Washington, D.C., on Tuesday,
November 27, 2002, at 1:49 p.m., before Beth Roots, Notary
Public in and for the District of Columbia, when were
present:

APPEARANCES:

On Family Broadcasting, Inc.:

LAUREN A. COLBY, Esquire
10 E. Fourth Street
P.O. Box 113
Frederick, MD 21705
(301) 663-1086

APPEARANCES (continued):

On Behalf of the FCC:

JAMES SHOOK, Esquire
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C.
(202) 418-1448

On behalf of the Deponent:

DANIEL HUBER, Esquire
560 N Street, S.W. #510
Washington, D.C.

C O N T E N T S

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>VOIR DIRE</u>
Gerald L. James, II	4	78	80	80	
			80		

P R O C E E D I N G S

(1:49 p.m.)

Whereupon,

GERARD L. JAMES II

having been duly sworn, was called as a witness
and was examined and testified as follows:

DIRECT EXAMINATION

BY MR. SHOOK:

Q Sir, I don't know if you had the pleasure of going through a deposition before. But if you ever need to take a break for any reason, just request it, and we'll take a break. If there is a question that I ask that you don't understand, I will repeat it, and if necessary rephrase it. If there comes a time when you recall that you said something that you wish to correct or add to or modify in some fashion, please let me know, and we'll try to get a corrected answer on the record.

Is there anything today that you believe would affect your testimony in any way, such as a health problem or other concern that you may have?

A No, sir.

Q Could you give me your date of birth, please?

A March 18, 1953.

0 Your current residential address.

A I live at the lieutenant governor's mansion. That

1 address -- we just call it the lieutenant governor's mansion
2 of the state.

3 Q Is there another residence that you will be moving
4 to for the --

5 A I'm in the process of purchasing a home right now.

6 Q Do you own any real property in the Virgin
7 Islands?

8 A I certainly do.

9 Q And what property is that?

10 A It's a property at -- I forget the estate.

11 Q Oh, is that the one of Catherine's?

12 A No, sir.

13 Q Oh, that's something else?

14 A This is one that I purchased with my wife.

15 Q Oh, oh, the one that you will be moving into?

16 A No. The one that was just purchased not too
17 longer ago, a year ago.

18 Q Okay. And that's an address that you don't
19 remember at this moment?

20 A Yes. I certainly don't.

21 Q Now is that a property that any members of your
22 family reside in at this point?

23 A No, sir. It's just raw land.

24 Q Oh, I see. There is no house on it at this point?

25 A No, no, no fixture whatsoever. Just raw land.

1 It's Estate Bugbyhole, but I don't know the number. I can't
2 recall that.

3 Q Is there any other real property that you and your
4 wife own on the Virgin Islands?

5 A I own my business, which is at 6AA La Grande
6 Princess, and that is the James Memorial Funeral Home.

7 Q Is that ownership in your name?

8 A Yes, sir.

9 Q How long have you operated that business?

10 A Since February of 1984.

11 Q Are there any other businesses that you own or
12 operate in the Virgin Islands?

13 A No, sir.

14 Q Is there a florist shop that is adjacent to the
15 business that you just mentioned?

16 A Yes, there is.

17 Q Is that florist shop owned by any member of your
18 family, so far as you know?

19 A That florist is owned by my parents.

20 Q So far as you know, they are the sole owners of
21 that business?

22 A They are.

23 Q Now is there a property on Catherine's Rest
24 that --

25 A Yes, there is.

1 Q -- that you have any interest in?

2 A No interest whatsoever.

3 Q Do you know who owns that property?

4 A The property is owned by my dad.

5 Q Is there a house on that property?

6 A There are apartment buildings, yes, sir.

7 Q Is there an apartment there that you or your wife
8 or children reside in?

9 A We used to reside there, yes, sir.

10 Q Used to? And at what point did you move out?

11 A January of 1999.

12 Q That's when you moved into the lieutenant
13 governor's mansion?

14 A Yes, sir.

15 Q Could you describe for me your education post high
16 school?

17 A Howard University, got a master of arts, 1976. I
18 also received a diploma from the American Academy McAllister
19 Institute of Funeral Service, and I am a licensed funeral
20 director in the state of New York, as well as the Virgin
21 Islands.

22 Q And could you describe your work experience post-
23 college?

24 A Did a stint in the military, and since that,
25 worked at the funeral home and did political service, public

1 service, as a senator, and now as a lieutenant governor.

2 Q As a senator in the Virgin Islands, was that part-
3 time work?

4 A Full-time, sir.

5 Q It was full-time?

6 A Yes, sir.

7 Q Was that in addition to your duties as funeral
8 home director?

9 A Yes, sir.

10 Q Could you name for me the various members of your
11 immediate family, beginning with your parents, your
12 siblings, and then your children and nieces and nephews?

13 A My dad, he goes by G. Luz A. James. My mother is
14 Asta. Her maiden name is Klyvert, K-l-v-e-r-t, James. One
15 sister, Barbara James Petersen. I am the eldest son. I
16 have a brother that is a year younger than me. His name is
17 Emmeth Valdemar James. And I also have a baby brother that
18 is a physician, a gynecologist. His name is Dr. Kelsey
19 Gerard James.

20 I personally have five children. I just adopted
21 one in my latest marriage. My son Gerard Luz Amwur James
22 III. I have a daughter by the name of Jeneé James. I also
23 have another daughter by the name of Janelle James, and a
24 daughter by the name of Jaleen (phonetic) James. And my son
25 I just adopted, his name is Jelani Bry (phonetic).

1 My sister has three children, Alita Petersen. She
2 also have Leah Petersen and one son, Jamie. We call him
3 Jamie. I guess he is German, Kelvin Petersen, Jr.

4 My brother Emmeth has two children, a daughter
5 named Chanel James and one son. Now his last name I know,
6 but his first name I can't tell you right off the bat. It
7 slip me for a moment. And my other brother, Kelsey, has two
8 children, a daughter and a son. And I don't know their
9 names right off the top.

10 Q Emmett [sic] is the brother that lives in New York
11 City?

12 A Emmeth.

13 Q Emmeth?

14 A Yeah. He works for Internal Revenue Service.

15 Q How often do you get to see him?

16 A Not too often. When I travel, if I go into New
17 York, I will see him.

18 Q Does he have occasion to come to the Virgin
19 Islands?

20 A On occasions, yes, he does.

21 Q Approximately when was he there last?

22 A He came just about a month ago.

23 Q And prior to that?

24 A I would say Christmas.

25 Q So almost a year ago now?

1 A Yeah.

2 Q Eleven months ago from now. Kelsey, he is the
3 brother that lives in New Orleans?

4 A He lives in New Orleans, but he is with the Air
5 Force and is on his way back now to Germany to serve in the
6 Air Force. He was in Italy the last time I talked to him.

7 Q How long had he been in Italy?

8 A I would say for about six months. He had a short
9 temporary duty from August to December.

10 Q So the Italian stint was temporary, if you will.

11 A Yes, it was.

12 Q And his permanent residence is still in New
13 Orleans?

14 A In New Orleans, that I know of, yes, sir.

15 Q His current intention is to resign from the Air
16 Force?

17 A Yes, he is. Yes, he is.

18 Q And establish a private practice in his medical
19 specialty?

20 A He just got involved with a firm up in Ashland,
21 Kentucky, where he will be moving to.

22 Q Does the funeral home business serve as your
23 primary source of income?

24 A Yes, sir.

25 Q And I take it there is a secondary source for your

1 services to the Virgin Islands government?

2 A As a public servant, yes, sir.

3 Q Is there any other source of income?

4 A No, sir.

5 Q Now you're familiar with the corporation called
6 Family Broadcasting, Inc., are you not?

7 A To a degree.

8 Q Have you made -- have you personally made any
9 commitments to supply money to Family Broadcasting, Inc.?

10 A I did it once.

11 Q Approximately how long ago?

12 A About seven years ago.

13 Q How did that come about?

14 A That came about through the Internal Revenue
15 Service closing the business down.

16 Q Were you requested to supply funds by someone?

17 A I was asked.

18 Q Who asked you?

19 A My parents.

20 Q How much did they ask for?

21 A They didn't ask for any specific amount.

22 MR. COLBY: Ma'am, can you hear him okay?

23 THE REPORTER: Yes.

24 MR. COLBY: I'm having a little trouble hearing,
25 but as long as the record picks up, okay.

1 THE WITNESS: You want me to speak up louder?

2 MR. COLBY: Speak up a little bit.

3 THE WITNESS: Okay.

4 MR. COLBY: I'm having trouble hearing.

5 THE WITNESS: Okay. I'll speak up.

6 MR. COLBY: She can because you have a microphone.

7 THE WITNESS: Okay.

8 MR. SHOOK: I'm hearing you just fine.

9 THE WITNESS: Yeah, but I'll speak louder so
10 Lauren can hear.

11 MR. SHOOK: That's fine. I'll understand that
12 you're not shouting at me.

13 (Laughter)

14 MR. SHOOK: That may come later, but I understand.

15 THE WITNESS: Oh, no, sir. You don't have to
16 worry about that.

17 BY MR. SHOOK:

18 Q With respect to what you gave for Friendly
19 Broadcasting, Inc., did you receive anything in return, such
20 as a stock certificate or a note or collateral, anything
21 along those lines?

22 A No, sir.

23 Q Do you recall how much it was that you gave?

24 A Yes.

25 Q And what was that?

1 A \$50,000.

2 Q Was that a one-time gift?

3 A Yes, it was.

4 Q It was meant as a gift?

5 A Yes, sir.

6 Q Not as a loan?

7 A No.

8 Q Not as a purchase of equity?

9 A No, sir.

10 Q Did there come a time when you became aware that
11 certain records of Family Broadcasting, Inc. reflected that
12 you had an equity interest in the company? By equity
13 interest, I mean a stock ownership.

14 A I have no interest in the company, sir.

15 Q No. Did there come a time when you became aware
16 that the records of Family Broadcasting, Inc. reflected that
17 you did own equity in the company?

18 A I signed a statement saying that I had no interest
19 in it, and I had no stocks. And that was the most recent
20 value or whatever.

21 MR. COLBY: May I clarify that?

22 MR. SHOOK: Sure.

23 MR. COLBY: I think what Mr. Shook was asking,
24 have you ever seen any written, handwritten, notes or other
25 records that show that you do appear to have stock in the

1 company?

2 THE WITNESS: No.

3 MR. COLBY: Okay. Thanks for letting me clarify.

4 BY MR. SHOOK:

5 Q I'm going to show you a document. It's a
6 photocopy of what I understand to be a yellow legal pad that
7 had some writing on it. And I'll just ask you first of all
8 whether you had ever seen this document or something similar
9 to it before.

10 A No, sir.

11 Q And just so that the record is somewhat clear what
12 it is that I'm doing here, the document that I'm showing Mr.
13 James is four pages in length, and it has a number of
14 columns, one being the number, the shorthand for the word
15 "number," the second being a name, the third being an
16 address, the fourth being an amount. And the numbers run
17 sequentially from 1 to 55, with the names of various
18 individuals written thereafter. And when it comes to number
19 46, you will see that your name appears, or at least I would
20 think that would be you. So what appears to be a Senator
21 Gerard Luz James II, and the number 1000 written after it.
22 And, Mr. James, do you have any knowledge what it is that
23 this entry represents?

24 A No, sir. This is my first time seeing this.

25 Q If I were to tell you that information had been

1 given to me that what this represents is stock certificate
2 No. 46 for Family Broadcasting, Inc. that was issued to you
3 for 1,000 shares, and that according to the records of
4 Family Broadcasting, Inc. you paid for those shares, would
5 that assist your recollection?

6 A No, sir.

7 Q Now I believe I asked you whether you personally
8 had made any commitments to fund Family, and if memory
9 serves, you answered no to that question.

10 A If I personally had any --

11 Q If you personally made any commitments to fund
12 Family Broadcasting, Inc.

13 A I haven't made any commitments, no.

14 Q Are you aware of anyone who has made any such
15 commitments?

16 A No, I am not.

17 Q Do you know whether specifically your mother has
18 made any commitments to fund Family Broadcasting, Inc. in
19 any way?

20 A No, sir. I can't say.

21 Q Now with respect to Family Broadcasting, Inc., are
22 you now any director of that company?

23 A No, sir.

24 Q Are you an officer of that company?

25 A No, sir.

1 Q Have you ever been a director of that company?

2 A No.

3 Q Have you ever been an officer of that company?

4 A No.

5 Q And so far as you know, you have never held any
6 stock ownership.

7 A None whatsoever.

8 Q Do you know who the current owners of Family
9 Broadcasting, Inc. are?

10 (No audible response)

11 BY MR. SHOOK:

12 Q It's perfectly acceptable to say you don't know if
13 you don't know.

14 A I don't know.

15 Q I mean, I didn't mean to rush you. It's just that
16 if it turned out that that's truly the situation, it's a
17 perfectly acceptable answer. Have you ever been to the
18 studio of Family Broadcasting, Inc.'s radio stations, WSTX-
19 AM and WSTX-FM?

20 A Yes, I have.

21 Q How often? When was the last time you were there?

22 A About three days before the election. I would say
23 about November 2nd.

24 Q And approximately when before that?

25 A About three weeks prior.

1 Q What were the occasions that brought you to the
2 radio stations?

3 A I went to the station along with my running mate
4 to do -- how would you say -- political tape.

5 Q This was for the purpose of producing a
6 commercial?

7 A Yes, for a political ad.

8 Q And was that the same purpose of the earlier trip?

9 A The earlier trip was to produce the ad. The
10 latter part was to make a statement to the general public.

11 Q This was in connection with your campaign for
12 governor --

13 A Yes, it was.

14 Q -- of the Virgin Islands?

15 A Yes, it was.

16 Q Now when you were at the radio stations, who, if
17 anyone, did you have to deal with?

18 A The deejay.

19 Q Did you have occasion to see any members of your
20 family when you were there at the radio stations?

21 A My sister.

22 Q Was there anybody else?

23 A No, sir.

24 Q Do you know what your sister's role is at the
25 radio stations?

1 A No, sir.

2 Q Do you know if she holds a title of any kind?

3 A She is supposed to hold a title of manager.

4 Q Do you know how long she has been the manager of
5 the radio stations?

6 A No, sir.

7 Q Approximately?

8 A I can't recall now.

9 Q Was there a time when your sister worked for you
10 in any way?

11 A Yes, sir.

12 Q Approximately when was that?

13 A That was during my senatorial time. The days I
14 can't -- I was a senator from '93 to '96. I can't pinpoint
15 the days, but she did work with me.

16 Q The senate term is a four-year term?

17 A No. It was two a term.

18 Q So you were elected in '92 and then again in '94?

19 A That is correct.

20 Q And then in '98 you were elected as lieutenant
21 governor?

22 A That is correct.

23 Q Have you ever received any money from Family
24 Broadcasting, Inc. for any reason whatsoever?

25 A No, sir.

1 Q And outside of that \$50,000 that you had mentioned
2 earlier, have you ever given money to Family Broadcasting,
3 Inc. for any purpose whatsoever?

4 A No, sir.

5 Q Do you have any knowledge as to what the current
6 value of Family Broadcasting, Inc. may be?

7 A No, sir.

8 Q Have you ever seen any balance sheets from Family
9 Broadcasting, Inc.?

10 A No, sir.

11 Q Have you ever seen any income statements from
12 Family Broadcasting, Inc.?

13 A No, sir.

14 Q Now aside from Mr. Colby and Mr. Huber, are you
15 aware of anyone who provides legal services of any kind to
16 Family Broadcasting, Inc.?

17 A No, sir.

18 Q Have you ever seen a stock ledger from Family
19 Broadcasting, Inc.?

20 A No, sir.

21 Q Have you ever seen stock certificates from Family
22 Broadcasting, Inc.?

23 A No, sir.

24 Q Have you ever seen minutes of directors' meetings
25 of Family Broadcasting, Inc.?

1 A No, sir.

2 Q Even though I realize that you've answered the
3 question that you were not a director of Family
4 Broadcasting, Inc., but for any reason have you attended a
5 directors' meeting of Family Broadcasting, Inc.?

6 A No, sir.

7 Q Now before the deposition started, you handed me a
8 document which appears to be a certificate of good standing
9 with respect to Family Broadcasting, Inc., and it bears the
10 date of November 25, 2002. How did you happen to come into
11 possession of this document?

12 A I spoke to attorney Colby, and he had mentioned to
13 me of this document, that the FCC was requesting it. And I
14 went ahead and deemed that I am the lieutenant governor.
15 This falls under my jurisdiction. I asked my sister to
16 assist me, and she certainly did, and she made contact with
17 an accountant that got the papers finalized. And then my
18 office was able to issue a certificate of good standing.

19 Q Do you know what it is that your sister had to do
20 in order to advance this process?

21 A No, sir. I couldn't tell you in detail.

22 Q And by that, I mean do you know whether or not
23 your sister, on behalf of Family Broadcasting, Inc., had to
24 pay a fee or fill out a form or --

25 A Oh, most definitely. Oh, yes. There was a fee

1 that was owed, otherwise we could not receive this.

2 Q And what fee was owed? And by that, I'm not
3 asking for the specific dollar amount. I'm just asking what
4 was this fee.

5 A There was a check that was tendered to my office
6 yesterday, and by myself I just delivered the check to the
7 young lady that signed on it. She is the assistant to the
8 Division of Corporation and Trademarks, Denise Johannes.
9 And I tendered the check. The check was in the amount of
10 \$1,000 and change.

11 Q That check was drawn on the account of Family
12 Broadcasting, Inc.?

13 A Yes, it was.

14 Q And the purpose of the check was for what? Was
15 that the fee that was due in order to get such a
16 certificate, or was the fee for some other reason?

17 A No. That was the fee to satisfy the Family
18 Broadcasting account.

19 Q Oh, were there back taxes of some kind owed?

20 A Yes, there were.

21 Q So before the certificate could be issued, the
22 account had to be brought up to date?

23 A Most definitely.

24 Q And that check covered the entire arrearage?

25 A It covered all, with the exception of a small

1 portion that Ms. Johannes would -- how would you say --
2 calculate and inform me as to what balance was owed so I
3 could tell my sister.

4 Q So there is going to be another check from Family
5 Broadcasting to the government of the Virgin Islands?

6 A Yes, sir.

7 Q In connection with the certificate of good
8 standing?

9 A I would say outside of that.

10 Q Related to it, though, in the sense that it had to
11 do with monies that had been owed by --

12 A Yes, sir.

13 Q -- Family to the government, now as being or is in
14 the process of being repaid.

15 A Yes, sir.

16 Q Does the name Francisco Depusoir mean anything to
17 you?

18 A Yes, sir. That is my accountant.

19 Q How long have you had him as your accountant?

20 A I can't recall. I really can't.

21 Q Has it been for more than 10 years?

22 A Close to, close to 10 years.

23 Q How often do you have communications with Mr.
24 Depusoir?

25 A Probably once a month.

1 Q Do you know whether or not he provides any
2 services to Family Broadcasting, Inc.?

3 A Yes.

4 Q And to your knowledge, what is it that he does?

5 A He was the one that prepared the papers that I
6 delivered to Corporation and Trademarks.

7 Q In connection with the certificate of good
8 standing?

9 A Yes, sir.

10 Q Do you have any knowledge as to whether Mr.
11 Depusoir is in the process of preparing tax returns,
12 corporate tax returns, for Family Broadcasting, Inc.?

13 A There was a list that was given by Ms. Johannes as
14 to what was due, and annual report was one and franchise
15 stocks was the other, that I can recall.

16 Q The particular document that I have in mind is the
17 federal corporate income tax return that most corporations
18 file on an annual basis. And my question was whether Mr.
19 Depusoir to your knowledge is in the process of preparing
20 any such returns on behalf of Family.

21 A I couldn't say, sir.

22 Q Does the name Rueben Jusino mean anything to you?

23 A Rueben?

24 Q Jusino. It's J-u-s-i-n-o. I think I'm
25 pronouncing it correctly.

1 A Never heard that name before.

2 Q Do you have any knowledge as to whether or not
3 Barbara receives any compensation for her role as manager at
4 radio stations WSTX-AM and FM?

5 A I don't know.

6 Q Do you know what role, if any, Barbara had with
7 the stations prior to her becoming manager?

8 A No, sir.

9 Q Well, it's my understanding that Barbara and her
10 three children reside with your parents at their house.

11 A Yes, they do.

12 Q And that she has done so for roughly the last 10
13 years.

14 A Yes.

15 Q Perhaps it has been a little longer than that, and
16 that's why I said roughly 10 years. What is your
17 understanding as to why Barbara lives with her parents --
18 your parents?

19 A I really don't know.

20 Q Do you have any knowledge as to whether your
21 parents receive any money from Barbara or on her behalf
22 relative to her residing with them?

23 A I couldn't say.

24 Q Do you have any knowledge as to where Family
25 Broadcasting, Inc.'s business records are kept?

1 A No, sir.

2 Q Do you have any knowledge as to where Family
3 Broadcasting, Inc.'s insurance records are kept?

4 A No, sir.

5 Q Do you have any knowledge as to where Family
6 Broadcasting, Inc.'s tax records are kept?

7 A No, sir.

8 Q Do you have any knowledge as to where Family
9 Broadcasting, Inc.'s stock records may be kept?

10 A No, sir.

11 Q Do you have knowledge as to what it was that
12 Family Broadcasting, Inc. paid to acquire radio stations
13 WSTX-AM and FM?

14 A No, sir. I can't recall. It was an exorbitant
15 amount, but I can't recall.

16 Q Do you have any knowledge as to where that money
17 came from to purchase the stations?

18 A Yes.

19 Q And to your knowledge, where did it come from?

20 A A loan from Scotia Bank, Bank of Nova Scotia.

21 Q Was that loan secured by any real property?

22 A Yes.

23 Q Do you know what real property it was?

24 A Property in Catherine's Rest and property in La
25 Grande Princess, that ran the Princess.

1 Q This was property that had been owned by -- or
2 perhaps still is owned by your parents?

3 A Probably owned by my parents, yes.

4 Q So far as you know, still currently owned by your
5 parents?

6 A The bank had repossessed -- or I shouldn't say
7 repossessed -- foreclosed. So I don't know where that
8 stands now.

9 Q Are you aware of any litigation that has taken
10 place with respect to that foreclosure that you mentioned?

11 A Yes.

12 Q What is it that you're aware of?

13 A That there is litigation. That's all.

14 Q Do you know who is a party to that litigation?

15 A I could say my dad and the bank.

16 Q And that would be as far as you know is the case.
17 Do you have any idea what the status of the litigation is?

18 A I certainly don't, but I would love to.

19 Q Do you know whether or not the radio stations
20 serve as a source of income to your parents?

21 A I don't know.

22 Q Do you have any knowledge as to what sources of
23 income other than the radio stations that your parents have?

24 A My mother is retired. She gets a pension. And my
25 father does legal work.

1 Q Are there any businesses that your father operates
2 in addition to whatever legal work he may do?

3 A Not that I know of.

4 Q Does he have any active role in the florist shop?

5 A No.

6 Q But so far as you know, he is an owner of that
7 florist shop.

8 A He owns the premises. I'm occupying the florist
9 shop right now.

10 Q There is an ongoing business, isn't there?

11 A There is.

12 Q And who has the ownership of that ongoing
13 business?

14 A I'm running the flower shop under James Memoria
15 Funeral Home, dba James Family Florist. The name of the
16 florist before was Family Florist. And when I took over, I
17 did the James Family Florist.

18 Q So the florist is -- I guess a way of looking at
19 it, a division of the funeral --

20 A Funeral home, yes, sir.

21 Q And how was it that the funeral home came to own
22 or operate the florist business?

23 A The florist was defunct for several years. There
24 was a young lady there by the name of Carol Hunter as a
25 florist. And I saw a need where I can use her experience

1 and talent in my business, and I continued to pay her a
2 salary.

3 I met with my parents, and I asked to use the
4 premises, and they had agreed.

5 Q So your parents owned the land or the building
6 in --

7 A That building is in question right now because of
8 the foreclosure by the bank, and that building means a lot
9 to my business because that's where my hearses, my caskets,
10 and all of the funeral supplies and equipment is located.

11 Q Is the funeral home itself in a separate
12 structure?

13 A Yes, it is.

14 Q Is that structure something that you own or
15 someone else owns?

16 A Yes, sir. I own that.

17 Q But you have equipment that is necessary for the
18 funeral home business that is --

19 A Housed -- the funeral home is located on the
20 property 6AA La Grande Princess. Where my vehicles are or
21 livery is on 6A La Grande Princess.

22 Q And 6A is one of the buildings that is --

23 A That's the building in question.

24 Q -- subject to that foreclosure?

25 A Yes, which I am paying rent to the bank on a

1 monthly basis.

2 Q How long has that been the case that you have been
3 paying rent to the bank?

4 A It has been a while. I can't say.

5 Q More than a year?

6 A Oh, most definitely. Most definitely.

7 Q As a result of the foreclosure action, are you
8 aware of whether or not Family Broadcasting, Inc. owes
9 anything further to the bank?

10 A I'm not aware of anything within the case at all.
11 As a matter of fact, I asked my dad up to last week. I'm
12 trying to purchase that building. The bank would not allow
13 me to purchase that building because they cannot issue clear
14 title. The title company is willing to work with me, but
15 they want to make sure that they can issue clear title. And
16 in order to do that, my father will have to, I would say,
17 take 6A out of the question in terms of the litigation that
18 is being forthcoming. But if you know my dad, he -- I tell
19 you, it's a sad case.

20 Q Well, I just had the pleasure a little while ago,
21 so I will leave it at that.

22 Now as we go through this, I'm going to show you a
23 number of documents.

24 A Surely.

25 Q But one of the documents that I am going to show